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11
12 U.S. DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA
15
16 SAN FRANCISCO DIVISION
17

18 MEDIA CHAIN, LLC,

19 Plaintiff,

20 v.

21 ROKU, INC.,

22 Defendant.

NO. 3:21-cv-009528-AGT

**UNOPPOSED MOTION FOR PHILLIP
N. SANOV TO WITHDRAW AS
COUNSEL FOR PLAINTIFF**

Honorable Edward M. Chen

1 The undersigned counsel, Phillip N. Sanov, Esq. (“Sanov”), pursuant to Local Rule 11-
2 5(a), respectfully moves to withdraw as counsel of record for Plaintiff, MEDIA CHAIN, LLC
3 (“Plaintiff”), and in support thereof states as follows:

4 1. This case was initially filed in the Western District of Texas.

5 2. On August 4, 2021, Sanov, also with the firm of Morgan and Morgan, P.A.,
6 appeared as local counsel for Plaintiff. [DE 36.]

7 3. On December 10, 2021, this case was filed to the Northern District of California.
8 California local California counsel appeared on Plaintiff’s behalf along with other attorneys who
9 appeared *pro hac vice*.

10 4. On January 10, 2022, Plaintiff’s attorneys and local California counsel moved to
11 withdraw due to irreconcilable differences (the “Motion”). Defendants did not oppose the motion
12 and Plaintiff consented to the withdrawal. [DE 75.]

13 5. On January 12, 2022, this Court granted the Motion and relieved Plaintiff’s local
14 California counsel, *pro hac vice* counsel, the law firms of Morgan and Morgan, P.A. and the
15 Brickell IP Group, PLLC of any further responsibility (the “Order”). [DE 77.]

16 6. Due to an inadvertent mistake, the Motion and Order did not name Sanov. Sanov
17 is not licensed to practice law in California and has not taken any active role in this matter. His
18 law firm, Morgan and Morgan, P.A., has already withdrawn.

19 7. The undersigned now seeks to amend the Court’s Order to include Sanov or have
20 the Court enter the attached Proposed Order allowing Sanov’s withdrawal.

21 8. Plaintiff has been notified of this Motion in writing on February 21, 2022.

22 9. Defendant does not oppose this motion.

10. Given the insubstantial nature of this Motion, as well as the substantial burden to all parties in travelling and attending a hearing on this Motion, the undersigned respectfully requests that the Court waive oral argument.

11. This motion is not filed for purpose of, and the relief sought will not result in, undue delay or prejudice to any party.

WHEREFORE, for the reasons stated, Counsel respectfully requests that the Court enter an order discharging Counsel, Phillip N. Sanov Esq. of the law firm Morgan & Morgan, P.A., as attorney of record for Plaintiff, Media Chain, LLC.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED at San Francisco, California, this 25th day of February, 2022.

MORGAN & MORAGN
COMPLEX LITIGATION GROUP

By: /s/ Michael F. Ram
Michael F. Ram

CERTIFICATE OF SERVICE

I, Michael F. Ram, hereby certify that on February 25, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to all registered CM/ECF users:

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DATED this 25th day of February, 2022.

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